

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. ) Case No. 4:22-cr-090-AGF-SRW  
CHUNY REED, )  
Defendant. )

**DEFENDANT'S MOTION TO REOPEN DETENTION HEARING**  
**AND PROPOSED ORDER**

Defendant, Chuny Reed, seeks to reopen her detention hearing pursuant to 18 U.S.C. § 3142(f) due to material information the defense learned after Ms. Reed's hearing, which was not available to defense counsel at the time of the hearing. After reopening Ms. Reed's detention hearing, this Court should find there are conditions that will assure Ms. Reed's appearance and the public's safety to allow for her release.

**Procedural History**

On February 8, 2022, a criminal complaint was filed against Ms. Reed. Dkt. No. 1. Ms. Reed was arrested the same day and the government moved for detention. Ms. Reed was ordered detained on February 14, 2022.

**Argument**

Under § 3142(f), this Court may reopen Ms. Reed's detention hearing after the defense learned about "information . . . that was not known to [the defense] at the time of the hearing and that has a material bearing on the issue whether there are conditions of release that will reasonably assure" public safety and Ms. Reed's appearance. 18 U.S.C. § 3142(f).

On July 13, 2022, Ms. Reed had a medical episode that has drastically impacted her health and substantially changed her public safety risk factors. This information is materially new information that changes the balance as to detention. The government has no opposition to Ms. Reed's release on bond in light of the change in circumstances. Pretrial also has recommended Ms. Reed be released on bond.

The Court should also find Ms. Reed is not a flight risk and that conditions can be fashioned to assure her appearance. Counsel requests she be released immediately with the condition to report to pretrial within 72 hours of release from the hospital.

**Conclusion**

Based on the above, this Court should reopen Ms. Reed's detention hearing and find there are conditions that will assure the public's safety as well as her appearance at future court proceedings.

Dated: July 15, 2022

Respectfully submitted,

/s/Diane L. Dragan  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Erin Granger, Assistant United States Attorney.

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UNITED STATES OF AMERICA,        )  
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CHUNY REED,                        )  
                                        )  
Defendant.                         )

**ORDER**

Based on information newly available to the Court, the Court concludes that at this time Defendant is neither a flight risk nor a danger to the community.

Accordingly,

**IT IS HEREBY ORDERED** that Defendant's Motion to Reopen the Detention Hearing is **GRANTED**.

**IT IS FURTHER ORDERED** that the defendant is to be released on bond with the condition to report to Pretrial Services within 72 hours of release from the hospital.

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UNITED STATES MAGISTRATE JUDGE

Dated this 15th day of July, 2022